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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 ANKER INNOVATIONS TECHNOLOGY  
10 CO., LTD.,

11 Plaintiff,

12 v.

13 AMERICA UGREEN LIMITED, UGREEN  
14 IMPORT & EXPORT CO., LTD., AND  
UGREEN GROUP LIMITED,

15 Defendant.

Case No. 2:25-cv-00379-JNW

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17 **STIPULATION AND ~~PROPOSED~~**  
18 **ORDER TO EXTEND TIME TO**  
19 **RESPOND TO THE COMPLAINT**

20 Plaintiff Anker Innovations Technology Co., Ltd (“Plaintiff” or “Anker”) hereby files  
21 this Stipulation to extend the date for Defendants America Ugreen Limited, Ugreen Import &  
22 Export Co., Ltd., and Ugreen Group Limited (collectively, “Defendants” or “Ugreen”) to  
23 respond to the Complaint, pursuant to Federal Rule of Civil Procedure 6(b), as follows:

24 1. Plaintiff filed this design patent infringement action against Ugreen on  
25 February 28, 2025.

26 2. America Ugreen Limited was served with the Complaint on March 7, 2025.

27 3. America Ugreen Limited’s response to the Complaint is currently due to this  
28 Court on March 28, 2025.

1. Plaintiff is informed and understands that Defendants have retained Ropes &  
Gray LLP as outside counsel in this action, and are currently in the process of retaining local  
counsel.

STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND TIME TO RESPOND TO THE  
COMPLAINT

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5. Plaintiff requested a waiver of service under Rule 4(d) from Defendants Ugreen Import & Export Co., Ltd., and Ugreen Group Limited via their counsel, Ropes & Gray LLP, on March 25, 2025. Both defendants returned the waiver the same day. Under Fed. R. Civ. P. 4(d)(3), the deadline for Defendants Ugreen Import & Export Co., Ltd., and Ugreen Group Limited to respond to the complaint is currently June 23, 2025.

6. To provide a consistent deadline for all Defendants, the parties met and conferred, and agreed to extend the time for all Defendants to respond to the complaint by 90 days from March 28, 2025, the current deadline for America Ugreen Limited, or **June 26, 2025**.

7. **THEREFORE**, Anker stipulates that Defendants shall have until June 26, 2025 to respond to the Complaint, and hereby requests that the Court issue an order setting June 26, 2025 as the deadline for any responsive pleadings.

Dated: March 26, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

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*Attorneys for Plaintiff Anker Innovations  
 Technology Co., Ltd.*

**~~PROPOSED~~ ORDER**

The Court having considered Plaintiff's Stipulation to Extend Time to Respond to the Complaint, and finding good cause, hereby ORDERS that Defendants America Ugreen Limited, Ugreen Import & Export Co., Ltd., and Ugreen Group Limited shall have until June 26, 2025 to respond to the Complaint.

The Court also reminds the Parties that, per chambers procedures, the instant motion is not necessary. "Parties may agree to extend the time for a defendant to answer or otherwise respond to a complaint. So long as the parties agree to an extension, there's no need to file a stipulation with the Court." § 5.3, Chambers Procedures – Civil (eff. April 24, 2024) (available at <https://www.wawd.uscourts.gov/judges/whitehead-chambers>). Nevertheless, the Court GRANTS the stipulated motion and EXTENDS the time for Defendants to answer or otherwise respond to the complaint.

IT IS SO ORDERED.

Dated: March 27, 2025



Honorable Jamal N. Whitehead  
United States District Judge